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                         UNITED STATES BANKRUPTCY COURT
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                         NORTHERN DISTRICT OF CALIFORNIA
13
                               SAN FRANCISCO DIVISION
14
   In re
                                         ) Case No. 19-30088 (DM)
15
   PG&E CORPORATION,
                                         ) Chapter 11
16
         and
                                         ) (Lead Case–Jointly Administered)
17
   PACIFIC GAS AND ELECTRIC
   COMPANY
18
                     Debtors
19
                                         ) REQUEST FOR RELIEF UPON
                                          DEFAULT IN SUPPORT OF MOTION
20
   Affects:
                                          FOR ORDER AUTHORIZING
                                          WITHDRAWAL OF COUNSEL
21
       PG&E Corporation
22
        Pacific Gas & Electric Company
                                          [RE: Dkt. Nos. 12878, 12879, 12880, and 12881]
23
     Both Debtors
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   * All papers shall be filed in the Lead
   Case, No. 19-30088 (DM).
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-AMODECLARATAONAN SUPPORT
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1	REQUEST FOR ENTRY OF ORDER BY DEFAULT
2	Under B.L.R. 9014-1(b)(4), Robins Cloud LP ("Firm") hereby requests that Court enter an
3	order by default on its Motion for Order Authorizing Withdrawal of Counsel to Cherish Cram
4	("Creditor") ¹ , Dkt. No. 12878 ("Motion").
5	RELIEF REQUESTED IN THE MOTION
6	The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the
7	Creditor.
8	NOTICE AND SERVICE
9	A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of
10	Counsel to Cherish Cram was filed concurrently with the Motion on August 27, 2022, Dkt. No.
11	12880 ("Notice and Opportunity for Hearing"). The Motion, the supporting declaration of Robert
12	Bryson, Dkt. No. 12879, and the Notice and Opportunity for Hearing were served as described in th
13	Certificate of Service filed on August 27, 2022, Dkt. No. 12881.
14	The deadline to file a response or opposition to the Motion has passed, and no opposition ha
15	been filed with the Court or received by the Firm.
16	DECLARATION OF NO OPPOSITION RECEIVED
17	The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
18	that:
19	1. I am an individual over 18 years of age and competent to make this Declaration.
20	2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly
21	admitted to practice before all courts of the State of California and the United States District Court
22	for the Northern District of California.
23	3. I am counsel for the law firm of Robins Cloud LP (the "Firm"), attorneys of recor
24	for Cherish Cram ("Creditor"). ²
25	
26 27 28	Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing Withdrawal of Counsel ("Bryson Decl."), ¶2, fn.1. 2 Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.
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Case: 19-38288UESPOPTIK REPEIEF UP ON UNITY AZUL FRINTS DE EVENEZATA NATIONALIZATION AND SUPPORTE OF 4

1	4. I have reviewed the Court's docket in these Chapter 11 Cases and determined	that
2	no response or opposition has been filed with respect to the Motion.	
3	5. A proposed order will be lodged concurrently as provided for in B.L.R. 9	9014
4	1(b)(3)(A).	
5	WHEREFORE, the Firm hereby requests that the Court enter the proposed order	file
6	concurrently herewith granting the Motion for the reasons set forth therein.	
7	Executed on October 6, 2022.	
8	GRIMSHAW LAW GROUP, P.C.	
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10	/s/ Matthew W. Grimshaw Matthew W. Grimshaw	
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12	Attorneys for Robins Cloud LLP	
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CERTIFICATE OF SERVICE I hereby certify that on October 6, 2022, I caused the forgoing **REQUEST FOR** RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Lacey Devereux. I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party: Cherish Cram P.O. Box 5181 Oroville, CA 95966 /s/ Matthew W. Grimshaw MATTHEW W. GRIMSHAW